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WESTERN STATES CONTRACTIC, INC.

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 JAY COLLINS,

12 Plaintiff,

13 vs.

14 WESTERN STATES CONTRACTING, INC, a
Nevada corporation; AND DOES 1-50,
15 inclusive,

16 Defendant.

Case No.: 2:20-cv-00302-JAD-NJK

**STIPULATION TO EXTEND EARLY
NEUTRAL EVALUATION BRIEFING**

(First Request)

17
18 IT IS HEREBY STIPULATED by and between Plaintiff JAY COLLINS (“Plaintiff”),
19 through his counsel, Watkins & Letofsky, LLP, Defendant, WESTERN STATES
20 CONTRACTING, (“Defendant” or “Western”), by and through its counsel, Jackson Lewis P.C.,
21 hereby stipulate and agree as follows:

22 1. On May 06, 2020, the Court entered an Order scheduling this matter for an Early
23 Neutral Evaluation (hereinafter referred to as “ENE”) hearing on June 16, 2020 at 9:30 a.m.
24 before the Honorable Brenda Weksler, United States Magistrate Judge. ECF No. 12.

25 2. The Court further ordered that written evaluation statements shall be received by
26 the Court no later than June 8, 2020.

27 3. The parties agree and respectfully request that, due to an unanticipated health
28 emergency relating to a member of Defendant’s counsel’s family, and office closures relating to

Covid-19 pandemic, the Court grant an extension of the deadline of its Early Neutral Evaluation briefing and Early Neutral Evaluation session for sixty (60) days.

4. This stipulation and order are sought in good faith and not for the purpose of delay.

5. This is the first request for an extension of the deadline of the Court's ENE briefing and written evaluation statements.

6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 8th day of June, 2020.

WATKINS & LETOFSKY, LLP

JACKSON LEWIS P.C.

/s/ Theresa M. Santos

/s/ Lisa A. McClane

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Attorneys for Defendant
WESTERN STATES CONTRACTING, INC.


Attorney for Plaintiff
JAY COLLINS

IT IS ORDERED that ECF No. 15
is GRANTED.

ORDER

IT IS FURTHER ORDERED that
the ENE in this case is rescheduled
to August 21, 2020. The pre-ENE
call is rescheduled to August 20,
2020 at 3:00 p.m. The parties ENE
statements are due on August 13,
2020 by 5:00 p.m.

IT IS SO ORDERED.



United States District Court / Magistrate Judge

Dated: 6/9/2020

4815-5910-0605, v. 1